

Honorable Judge:

FILED

John W. Primomo,

JUL 27 2015
CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXAS

BY

REPUTY

"Amended Complaint"

Case: 5:15-CV-00465 Civil Action No. SA-15-CA-165-FB

Your Honor, I HAVE ENCLOSED THE
IN FORMA PAUPERIS DOCUMENT ATTACHED WITH
MY CURRENT INSTITUTIONAL TRUST FUND ACCOUNT
STATEMENTS, SHOWING ALL INMATE ACCOUNT
ACTIVITIES FOR THE PREVIOUS SIX MONTH'S,

Your Honor, I HAVE ALSO MAILED TO THE
COURTS MY ORIGINAL PETITION FOR WHICH I THE
PLAINTIFF: RAYMOND TELLEZ AM ATTEMPTING TO
FILE MY STATEMENT OF CLAIM, YOUR HONOR,
PLAINTIFF AND DEFENDANT ARE FROM DIFFERENT
STATES, THE BASIS FOR DIVERSITY JURISDICTION
OF CITIZENSHIP IS DISTINCTLY AND ADEQUATELY
ALLEGED WITHIN PLAINTIFF(S) ORIGINAL PETITION/
STATEMENT OF CLAIM: RE:

2. Plaintiff(s) resides in BEXAR COUNTY, TEXAS THE
INDIVIDUAL HEREINAFTER REFERRED TO AS:
RAYMOND TELLEZ.
3. Defendant(s) NAME ARE: THE G.E.O. GROUP INC.,
G.E.O. AND G.E.O. GROUP FACILITY CENTRAL DETENTION
FACILITY.
4. Service of Process: Defendant The G.E.O. group Inc.
does BUSINESS IN BEXAR COUNTY, TEXAS AND
MAY be SERVED BY SERVING IT'S REGISTERED AGENT: _____

5. VENUE IS PROPER IN BEXAR COUNTY, TEXAS BECAUSE THE DATE AND TIME OF THE ALLEGED INCIDENT MADE THE BASIS OF THIS LAWSUIT, WHICH OCCURED ALL IN BEXAR COUNTY, TEXAS, THIS COURT HAS JURISDICTION OVER THE SUBJECT MATTER AND OR PARTIES INVOLVED IN THIS LAWSUIT.

PLAINTIFF MAKES A PLEADING ALL IN THE ALTERNATIVE PURSUANT TO RULE 47, 48, WHEREFORE PREMISES CONSIDERED, PLAINTIFF PRAYS THAT THE DEFENDANT(S) BE CITED TO APPEAR AND ANSWER AND UPON FINAL TRIAL, PLAINTIFF HAVE JUDGMENT AGAINST DEFENDANT FOR ACTUAL AND SPECIAL DAMAGES, COSTS OF COURT, PRE-JUDGMENT AND POST JUDGMENT INTEREST AT THE HIGHEST RATE UNTIL PAID AND FOR SUCH OTHER AND FURTHER RELIEF TO WHICH PLAINTIFF MAY BE ENTITLED AT LAW OR IN EQUITY, ALL WITHIN THE JURISDICTIONAL LIMITS OF THIS COURT.

Respectfully Submitted
Pro Se Plaintiff /
Prisoner filer,
Raymond Jellez.